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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

**AFD CHINA INTELLECTUAL
PROPERTY LAW (USA) OFFICE, INC.,**
an Oregon corporation,

Plaintiff,

-vs-

**AFD CHINA INTELLECTUAL
PROPERTY LAW OFFICE,** a Chinese
Corporation,

Defendant,

**AFD CHINA INTELLECTUAL
PROPERTY LLC,** a Maryland limited
liability company,

Counterclaim Plaintiff,

-vs-

LEI WANG, a/k/a LYNN WANG,

Third Party Counterclaim Defendant.

Case No.: 3:09-CV-1509-BR

**AFD CHINA'S AND AFD LLC'S MOTION
FOR REIMBURSEMENT OF EXPERT
WITNESS COSTS**

Request for Oral Argument

AFD China Intellectual Property Law Office (“AFD China”) and AFD China Intellectual Property LLC (“AFD LLC”) hereby request that the Court order AFD USA to reimburse AFD China for the costs it incurred responding to the Expert Report of Serena Morones. Despite AFD USA’s numerous assertions to this Court that Ms. Morones’ report would be “substantially similar” to the opinions previously asserted by Darrell Dorrell before his withdrawal as AFD USA’s expert, Ms. Morones submitted an entirely new damage model. AFD China’s and AFD LLC’s expert was forced to abandon a significant portion of his previous work on this matter and respond to Ms. Morones’ new model. AFD USA’s substitution of a new expert, new damage model, and new conclusions substantially prejudiced AFD China and AFD LLC. AFD China and AFD LLC incurred substantially more costs than they would have had Ms. Morones adopted Mr. Dorrell’s prior work and produced a substantially similar report as AFD USA promised. Therefore, the Court should order AFD USA to reimburse AFD China and AFD LLC for the \$68,738.75 in expert costs it incurred.

Dated: December 20, 2013

/s/ Aimee M. Furness

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ATTORNEYS FOR AFD CHINA
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of AFD China's and AFD LLC's Motion for Reimbursement of Expert Witness Costs has been served on all counsel of record, as indicated below, on this 20th day of December, 2013.

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Via Email

/s/ Aimee M. Furness

Aimee M. Furness